

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, LUKE LOE, RICHARD ROE, and  
MARY MOE, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity,  
DONALD TRUMP JR., ERIC TRUMP, and  
IVANKA TRUMP,

*Defendants.*

**NOTICE OF RENEWED MOTION  
TO WITHDRAW APPEARANCE**

No. 18 Civ. 9936

**NOTICE OF RENEWED MOTION TO WITHDRAW APPEARANCE**

PLEASE TAKE NOTICE that, upon the accompanying declarations of Roberta A. Kaplan dated October 16, 2019, and Joshua Matz, dated October 15, 2019, and pursuant to Local Civil Rule 1.4, Plaintiffs respectfully renew their request for the withdrawal of the appearance of Joshua Matz as counsel on their behalf. Plaintiffs further request, pursuant to Section 2.5 of the Electronic Case Filing Rules and Instructions, that the email address jmatz@kaplanhecker.com be removed from the ECF service notification list for this case.

Plaintiffs shall continue to be represented by remaining counsel of record from Kaplan Hecker & Fink LLP and Emery Celli Brinckerhoff & Abady, LLP.

Dated: October 16, 2019

Respectfully submitted,

/s/ Roberta A. Kaplan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, LUKE LOE, RICHARD ROE, and  
MARY MOE, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

*v.*

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity,  
DONALD TRUMP JR., ERIC TRUMP, and  
IVANKA TRUMP,

*Defendants.*

**DECLARATION IN SUPPORT  
OF RENEWED MOTION TO  
WITHDRAW**

No. 18 Civ. 9936

**DECLARATION IN SUPPORT OF RENEWED MOTION TO WITHDRAW**

I, Roberta A. Kaplan, declare and state as follows:

1. I am the founding partner of Kaplan Hecker & Fink LLP and lead counsel for Plaintiffs in the above-captioned action.
2. I submit this declaration in support of the renewed motion for Joshua Matz to withdraw his individual appearance as counsel for Plaintiffs.
3. On October 29, 2018, Mr. Matz, who was then associated with Kaplan Hecker & Fink LLP, filed a Notice of Appearance (Doc. No. 6) on behalf of all Plaintiffs in the above-captioned action.
4. As of yesterday, October 15, 2019, however, Mr. Matz is no longer affiliated with Kaplan Hecker & Fink LLP.

5. Plaintiffs shall continue to be represented by me and their remaining counsel of record from Kaplan Hecker & Fink LLP and Emery Celli Brinckerhoff & Abady LLP. Joshua Matz's withdrawal will not affect this action in any way, including the posture of the case and the calendar; nor will it prejudice Defendants.
6. Neither Mr. Matz nor either of the firms acting as counsel for Plaintiffs in the above-captioned action is asserting a retaining or charging lien against Plaintiffs.
7. For the reasons set forth herein, in addition to those set forth in Joshua Matz's declaration dated October 15, 2019, which is attached as Exhibit 1 hereto, I respectfully request the Court grant the motion for Mr. Matz to withdraw his individual appearance as counsel for Plaintiffs.
8. I am causing this motion, including all of the papers submitted with the motion, to be served on the parties and the clients of Kaplan Hecker & Fink LLP and Emery Celli Brinckerhoff & Abady LLP in this action.

Dated: October 16, 2019  
New York, New York

/s/ Roberta A. Kaplan  
Roberta A. Kaplan

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARY MOE, individually and on behalf of all  
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*Plaintiffs,*

v.

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity,  
DONALD TRUMP JR., ERIC TRUMP, and  
IVANKA TRUMP,

*Defendants.*

**DECLARATION IN SUPPORT OF  
NOTICE OF WITHDRAWAL**

No. 18 Civ. 9936

**DECLARATION IN SUPPORT OF NOTICE OF WITHDRAWAL**

I, Joshua Matz, declare and state as follows:

1. On October 29, 2018 I filed a Notice of Appearance (ECF 6) on behalf of all Plaintiffs in the above referenced action.
2. As of today, October 15, 2019, I am no longer affiliated with Kaplan Hecker & Fink LLP. Therefore, and pursuant to Local Civil Rule 1.4, I respectfully request the Court withdraw my individual appearance as counsel for Plaintiffs.
3. Plaintiffs shall continue to be represented by remaining counsel of record from Kaplan Hecker & Fink LLP and Emery Celli Brinckerhoff & Abady, LLP. This withdrawal will not affect this action in any way, nor will this withdrawal prejudice Defendants.

Dated: October 15, 2019

Respectfully submitted,

/s/ Joshua Matz

Joshua Matz